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13 Attorneys for Plaintiffs DORA SOLARES  
14 [Counsel for Defendants on signature page]

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 DORA SOLARES,

18 Plaintiff,

19 v.

20 RALPH DIAZ, in his individual  
21 capacity, KENNETH CLARK, in his  
22 individual capacity, JOSEPH BURNS,  
23 in his individual, and DOES 1 TO 15, in  
24 their individual capacities

25 Defendants.

Case No. 1:20-cv-00323-LHR-BAM

**[PROPOSED] STIPULATED  
AMENDED SCHEDULING AND  
DOCKET CONTROL ORDER; AND  
ORDER THEREON**

Hon. Lee H. Rosenthal

26 **COME NOW** Plaintiff Dora Solares and Defendants Burnes, Gallemore,  
27 Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva and  
28

1 hereby stipulate and submit the following proposed amended schedule to control  
2 the above-listed matter:

3  
4 1. August 22, 2025

**COMPLETION OF NON-EXPERT  
DISCOVERY**

5  
6 Written discovery requests are not  
7 timely if they are filed so close to this  
8 deadline that under the Federal Rules of  
9 Civil Procedure the response would not  
be due until after the deadline.

10 2. September 5, 2025

**EXPERTS ON MATTERS OTHER  
THAN ATTORNEYS' FEES**

11  
12 The plaintiff (or the party with the  
13 burden of proof on an issue) will  
14 designate expert witnesses in writing  
15 and provide the report required by Rule  
16 26(a)(2) of the Federal Rules of Civil  
Procedure.

17 3. October 3, 2025

**OPPOSING EXPERTS**

18  
19 The opposing party will designate  
20 expert witnesses in writing and provide  
21 the report required by Rule 26(a)(2) of  
the Federal Rules of Civil Procedure.

22 4. October 24, 2025

**CLOSE OF EXPERT DISCOVERY**

23 5. November 21, 2025

**PRETRIAL DISPOSITIVE  
MOTIONS DEADLINE**

24  
25 No motion may be filed after this date  
26 except for good cause.  
27  
28

1 6. January 9, 2026

**JOINT PRETRIAL ORDER AND  
MOTION IN LIMINE DEADLINE**

2  
3 The Joint Pretrial Order will contain the  
4 pretrial disclosures required by Rule  
5 26(a)(3) of the Federal Rules of Civil  
6 Procedure. Plaintiff is responsible for  
7 timely filing the complete Joint Pretrial  
8 Order. Failure to file a Joint Pretrial  
9 Order timely may lead to dismissal or  
10 other sanction in accordance with the  
11 applicable rules.

12 7. January 23, 2026

**DOCKET CALL**

13 Docket Call will be held at 2:00 p.m. in  
14 a location to be determined. No  
15 documents filed within 7 days of the  
16 Docket Call will be considered.  
17 Pending motions may be ruled on at  
18 docket call, and the case will be set for  
19 trial as close to the docket call as  
20 practicable.

21 Any party wishing to make any discovery motions should arrange for a pre-  
22 motion conference with the court before the preparation and submission of any  
23 motion papers. That includes a motion to compel, to quash, or for protection. Email  
24 Glenda Hassan at [glenda\\_hassan@txs.uscourts.gov](mailto:glenda_hassan@txs.uscourts.gov) or fax her at 713-250-5213 to  
25 arrange for a pre-motion conference. Notify your adversary of the date and time for  
26 the conference.

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Respectfully submitted,

Dated: June 3, 2025

LAW OFFICES OF ERIN DARLING

By:

/s/

Erin Darling,  
Attorneys for Plaintiff Dora Solares

Dated: June 3, 2025

Respectfully submitted,

ROB BONTA  
Attorney General of California  
JON S. ALLIN  
Supervising Deputy Attorney General

***/s/ Jeremy Duggan (as authorized on 6/3/25)***

JEREMY DUGGAN  
Deputy Attorney General  
*Attorneys for Defendants  
Burnes, Gallemore, Gamboa, Garcia,  
Maytubby, Munoz, Loza, and Pena*

Dated: June 3, 2025

ANDRADA & ASSOCIATES

***/s/ Lynne G. Stocker (as authorized on 6/2/25)***

By: Lynne G. Stocker  
*Attorneys for defendant SILVA*

IT IS SO ORDERED.

Dated: June \_\_\_\_\_. 2025

\_\_\_\_\_  
Lee H. Rosenthal  
Senior United States District Judge